

AMOS
VS
THE LAMPO GROUP LLC, et al.

DISCOVERY DISPUTE CONFERENCE

May 02, 2023



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UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

BRAD AMOS,
Plaintiff,
vs.
Case No. 3:21-cv-00923
THE LAMPO GROUP, LLC,
et al.,
Defendants.

DISCOVERY DISPUTE CONFERENCE

May 2, 2023

Commencing at 12:04 p.m. CST

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1 * * *

2 MS. SANDERS: Okay, you ready, Jon?

3 You good to go.

4 MR. STREET: Uh-huh.

5 MS. SANDERS: All right. I've got --

6 I've got a small list of things, I thought

7 maybe we could just go in buckets.

8 MR. STREET: Okay.

9 MS. SANDERS: Like, so to start with,

10 I think this is an easy one, you had issued a

11 subpoena. I don't know how you pronounce it,

12 but they're doing business as INC Mansueto [sp]

13 maybe? I'm not seeing those documents, so I

14 don't know, maybe you --

15 MR. STREET: From INC?

16 MS. SANDERS: Uh-huh.

17 MR. STREET: We didn't get any.

18 MS. SANDERS: Okay, got it. I just

19 had that on my list.

20 And then as far as the subpoena to

21 Melissa Amos, she wants to do the deposition,

22 instead of the 11th, on the 9th. We already

23 have -- who do we have on the 9th -- Armando

24 Lopez on the 9th.

25 MR. STREET: Uh-huh.

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1 MS. SANDERS: So do you want to do
2 them both on the same day? I can move Armando
3 to the 11th if you'd rather swap them.
4 MR. STREET: Uh-huh. His personal
5 depo, maybe -- can we -- is there any chance --
6 I really am supposed to go get a CT scan
7 tomorrow.
8 MS. SANDERS: Okay.
9 MR. STREET: I'd really like to
10 change Laura Johnson to next week because of
11 that.
12 MS. SANDERS: Yeah, I've got her on
13 the list, too. You asked me to check on the
14 8th and 10th. Laura -- those were days she'd
15 originally given me. She did e-mail me, and
16 let me just pull that up because I -- she
17 e-mailed -- I know that it's going to work, I
18 just don't know -- it's either the 8th or the
19 10th. Let me see what she says.
20 I think she's okay on both dates. For
21 me, the 8th would be better, but let me just
22 double-check that.
23 MR. STREET: That's the day we've got
24 JB Wagner right now.
25 MS. SANDERS: Yeah.

1 MR. STREET: Okay, that might -- I
 2 don't think that that one -- I think it'll take
 3 all day.
 4 MS. SANDERS: Laura or JB?
 5 MR. STREET: Both.
 6 MS. SANDERS: Or both -- okay.
 7 She says the 10th -- Laura says the 10th
 8 is better than the 8th, but she can make either
 9 work. So the 10th is David DiCicco. The 8th
 10 is Laura and -- or is JB.
 11 MR. STREET: Right.
 12 MS. SANDERS: So which day would you
 13 rather do her?
 14 MR. STREET: But she can't do any day
 15 besides the 8th or 10th?
 16 MS. SANDERS: Those are the only days
 17 she had next week. I've made -- those are the
 18 only days that she had given me for next week,
 19 and I asked her if she had any others. And so
 20 far, the 10th and the 8th, she's still got
 21 them. She's booked something on the 8th, but
 22 she says she can change it.
 23 MR. STREET: Oh, okay.
 24 Yeah, while we're here, I think we are
 25 probably going to ask the Court to give us a

1 MR. STREET: And we have somebody
 2 Friday.
 3 MS. SANDERS: That's Luke LeFevre.
 4 MR. STREET: Okay.
 5 MS. SANDERS: I might be able to
 6 move -- I might be able to move JB. I didn't
 7 think about that. Like, we might can to move
 8 JB to the 11th. I don't know, let me look and
 9 see if that's a date that we had for him. Let
 10 me look and see.
 11 Because he's -- he works at Ramsey, so, I
 12 mean, he's -- he -- he and Laura are easier to
 13 schedule because they are employees. Let's
 14 see.
 15 All right. Do you have Wi-Fi, guest
 16 Wi-Fi, John?
 17 MR. STREET: Uh-huh. It should be EC
 18 Law, and the password -- let me see, I always
 19 forget what it is.
 20 MS. SANDERS: Because you never have
 21 to connect.
 22 MR. STREET: Exactly.
 23 THE REPORTER: Actually, it might be
 24 right here.
 25 MS. SANDERS: Oh, yeah. There we go.

1 few more weeks to finish these up.
 2 MS. SANDERS: Okay. Yeah, we're --
 3 we're not going to agree, but that's certainly
 4 your prerogative.
 5 MR. STREET: Uh-huh. So...
 6 MS. SANDERS: And I'm willing to do
 7 the 8th like a long day, you know, if that
 8 helps. The issue on the 10th is David DiCicco
 9 does not work at Ramsey anymore.
 10 MR. STREET: Uh-huh.
 11 MS. SANDERS: So coordinating him is,
 12 you know, more trouble --
 13 MR. STREET: We'll just keep her
 14 tomorrow.
 15 MS. SANDERS: Well, I've already --
 16 well, now I've already called her off tomorrow.
 17 Let me make sure. You do want to keep her
 18 tomorrow, though?
 19 MR. STREET: Yeah, I mean, because
 20 we've got -- like I said, we've got one on the
 21 8th and the 10th, so we can't -- we got
 22 DiCicco.
 23 MS. SANDERS: Okay. Let me just --
 24 I'm going to ask her that while I'm here, just
 25 to make sure.

1 Is that it? Okay, yeah.
 2 I don't know that it's showing up, let me
 3 look.
 4 Here we go, E and C, okay.
 5 MR. STREET: I'm sorry, did you want
 6 some coffee or a soda or something like that?
 7 MS. SANDERS: No, I'm good. Thank
 8 you.
 9 Let's see. This might be faster if I
 10 connect to your -- because I'm having to look
 11 locally. Oh, it's telling me I can't connect.
 12 Did you connect? Are you connected?
 13 THE REPORTER: I don't use Wi-Fi.
 14 MS. SANDERS: Let me try it again.
 15 All right, let me try one more time. If
 16 not, I can -- I can probably get it on my
 17 phone. There we go.
 18 All right, let's see.
 19 Okay. Sorry, it's just taking me a
 20 while.
 21 Yeah, I'm not finding JB's availability.
 22 The last thing I had from -- I know I had it,
 23 but I can't pinpoint it. The last time I
 24 got -- the last one I have on here was back in
 25 April, but I could check to see. That might --

1 if he can do it on the 11th, then we can put
 2 Laura on the 8th.
 3 MR. STREET: Uh-huh.
 4 MS. SANDERS: So we'd put -- it would
 5 be Luke this Friday, Laura on Monday, DiCicco
 6 -- well, Armando and Ms. Amos, if can you do
 7 them on the same day.
 8 MR. STREET: Tuesday.
 9 MS. SANDERS: Yeah. DiCicco on
 10 Wednesday, and then JB on Thursday, but let me
 11 just make sure he can do Thursday.
 12 MR. STREET: And Mr. Ramsey on
 13 Friday.
 14 MS. SANDERS: Yeah, you noticed him
 15 on Friday. I mean, we'll see what the Court
 16 says. Hopefully they'll rule.
 17 All right, let's see.
 18 In fact -- let me see. I don't know
 19 where that -- I may get -- let me get Lauren to
 20 -- let me -- if you don't mind, I'm just going
 21 to call Lauren really quick and ask her to find
 22 out about JB. That'll be faster than me
 23 sitting here trying to figure it out and then
 24 not even --
 25 MR. STREET: My Lauren?

1 MS. SANDERS: What'd you say?
 2 MR. STREET: I just flew back from
 3 Los Angeles yesterday.
 4 MS. SANDERS: Oh, really? You should
 5 have stayed. You should have stayed.
 6 So I'll -- right now, she's scheduled for
 7 10 o'clock, which is noon our time. So maybe
 8 we should put her later in the afternoon. You
 9 could maybe do Armando in the morning?
 10 MR. STREET: Okay. That's fine,
 11 either way you want to do it. I don't know --
 12 I need to go back. I'm going to say, like, you
 13 know, I've been getting ready for these first
 14 few, I haven't gotten to Armando yet.
 15 MS. SANDERS: Yeah, yeah.
 16 MR. STREET: But I believe that I
 17 asked him a good bit already.
 18 MS. SANDERS: Yeah, you did. I went
 19 back and looked at his deposition, and I think
 20 you covered a lot. That's why I was thinking
 21 that it would be a good one to double up on.
 22 MR. STREET: Yeah, I think it will be
 23 the shorter one of the ones we do.
 24 MS. SANDERS: Okay, okay. So I'll --
 25 I'll be in touch with her attorney. I told him

1 MS. SANDERS: My Lauren.
 2 MR. STREET: Oh.
 3 MS. SANDERS: We both have a Lauren,
 4 so not your Lauren.
 5 All right, let me just call her really
 6 quick.
 7 MR. STREET: Sure.
 8 MS. SANDERS: And she'll -- that way,
 9 we can keep going.
 10 (WHEREUPON, a brief off-the-record
 11 phone conversation was held.)
 12 MS. SANDERS: All right, she's going
 13 to find out. Okay.
 14 MR. STREET: Okay.
 15 MS. SANDERS: All right, so we'll
 16 figure that out. And then Melissa Amos -- I
 17 told Lauren I'd send you a Zoom link.
 18 MR. STREET: Uh-huh.
 19 MS. SANDERS: I may have to go out
 20 there in person. So if I do, then it's fine.
 21 Daniel can just sit in on Armando's.
 22 The timing might be a little weird,
 23 because she's on Pacific Time, you know.
 24 MR. STREET: Yeah, I just flew back
 25 from out there yesterday.

1 as soon as I met with you, I would confirm the
 2 9th.
 3 MR. STREET: Uh-huh.
 4 MS. SANDERS: Let me see if -- he
 5 might rather come in the afternoon, you know
 6 what I mean? So like 10 o'clock in LA, I mean,
 7 if we scheduled her at 1 or 2 o'clock in LA,
 8 that's -- well, 1 o'clock would be 3 o'clock
 9 our time. So that would give you quite a bit
 10 of time to finish with Armando.
 11 MR. STREET: Yeah, I think that would
 12 be -- if we started at 9:00 with Armando, that
 13 day would be plenty of time.
 14 MS. SANDERS: Yeah, okay.
 15 All right, so let me check with him on
 16 that, and that shouldn't be an issue. I can --
 17 I probably have two hours max. So I think it
 18 will still be a normal -- you know, a normal
 19 day. I don't think we'll have to stay late.
 20 All right, so let me just -- I'll follow
 21 up with him, and I'll send you an e-mail this
 22 afternoon and let you know that for sure.
 23 Then the only other thing, I had reserved
 24 an hour for the Plaintiff. I need to squeeze
 25 that in somewhere, but it's really only on

1 hour. It's all I've got. So what day do you
2 think works best?
3 MR. STREET: I mean, I am -- Lauren
4 was going to cover that one, but she's -- looks
5 like -- I'll check with her. Looks like she
6 may have another deposition in another case
7 Thursday, but I'm free Thursday.

8 MS. SANDERS: This coming Thursday?

9 MR. STREET: Uh-huh. And then --

10 MS. SANDERS: Okay. Okay. Yeah,
11 that would be great. You want to just check
12 with him and...

13 MR. STREET: Yes.

14 MS. SANDERS: Okay. So Thursday, the
15 4th. Of course, we'll do that by Zoom.

16 MR. STREET: Uh-huh.

17 MS. SANDERS: You know, no reason
18 to -- for him to come here for that.

19 Okay, so let's see. Okay, perfect.

20 All right, that's all I got to know on
21 depositions, unless you've got -- that's -- I
22 think that gets all the ones that we've talked
23 about. Are there any -- anything else you need
24 to talk about on depositions?

25 MR. STREET: I mean, there's the rest

1 anything else we could ask for.
2 MS. SANDERS: Well, let me know if
3 you want to -- like, with this afternoon, let
4 me know who -- like, how many more you want,
5 who you plan on taking. I mean, obviously,
6 I'll consider it --

7 MR. STREET: Okay.

8 MS. SANDERS: -- and we'll see.
9 We'll just see where that lands.

10 MR. STREET: We've got one we've been
11 working on, it's just -- it's not our --
12 unfortunately, our usual kind of motions. It's
13 one where I just say, we tried, we asked for
14 dates, they couldn't get the dates we wanted.
15 Discovery deadline hit, we wanted to do it
16 after, then we didn't do it after. Now we have
17 all this time, but we have all these
18 depositions, both sides want to take them, and
19 we got documents still coming from the last
20 order, so...

21 MS. SANDERS: Yeah.

22 MR. STREET: And I don't -- just
23 these depositions, I don't need very much at
24 all.

25 MS. SANDERS: Uh-huh.

1 we want to take, but I don't see how we fit
2 them in before the 12th. That's why I said we
3 need to take an --

4 MS. SANDERS: Extension?

5 MR. STREET: Ask the Court for a
6 little extension.

7 MS. SANDERS: Okay. Just let me know
8 what you want to do on that.

9 MR. STREET: And if we did do that, I
10 don't mind, again, putting Ramsey's at the end
11 of an extension.

12 MS. SANDERS: Yeah.

13 MR. STREET: But I think you guys
14 would prefer that, so maybe you could -- would
15 not oppose or join -- even join in my motion.

16 MS. SANDERS: Yeah. I mean, if the
17 motion is limited to depositions, I think --

18 MR. STREET: It is. We're done with
19 discovery.

20 MS. SANDERS: Yeah, okay. Just --

21 MR. STREET: And I'll say this:
22 Unless something comes up in the depositions,
23 but --

24 MS. SANDERS: Right.

25 MR. STREET: -- I don't know that

1 MR. STREET: So I've got the --
2 Lauren and I have a jury trial May 15th --
3 MS. SANDERS: Okay.

4 MR. STREET: -- in Memphis. And then
5 I have a -- when is that? That's Brandon. I
6 have something -- the first week of June, I'm
7 out for the whole week on a case out west we're
8 part of.

9 MS. SANDERS: Okay.

10 MR. STREET: So I would -- I would --
11 you know, I -- if Lauren's in that hearing,
12 that doesn't affect me. Like, in the middle of
13 June --

14 MS. SANDERS: Uh-huh.

15 MR. STREET: -- is what we'd ask for,
16 so a month.

17 MS. SANDERS: All right.

18 MR. STREET: And then that gives them
19 the -- is it 120 or 150 days she likes?

20 MS. SANDERS: 120.

21 MR. STREET: Okay, that should --
22 then that's plenty, and my timing with these is
23 150, so...

24 MS. SANDERS: Uh-huh. Summary
25 judgment will be due --

<p style="text-align: right;">Page 17</p> <p>1 MR. STREET: Like in August sometime. 2 MS. SANDERS: Or July, yeah. 3 Yeah, I think the -- I think the thing to 4 do is just let me know, like, who you still 5 need to schedule. 6 MR. STREET: It would be on that list 7 I sent already. 8 MS. SANDERS: Okay. 9 MR. STREET: And I think we struck a 10 couple and we're keeping those people struck, 11 and -- 12 MS. SANDERS: Okay. What about the 13 30(b)(6)? You mentioned the 30(b)(6). Do you 14 want to do -- do you want to send me some 15 topics or at least -- we talked about a 16 30(b)(6) for the HRC, but I don't know if you 17 meant that or a continuation of the 30(b)(6). 18 MR. STREET: No, I meant -- I was 19 thinking a new one regarding -- what -- what 20 did the Judge call it? The best workplace 21 discovery. 22 MS. SANDERS: Oh, okay. 23 MR. STREET: I think that would be a 24 topic, and instead of naming people 25 individually because --</p>	<p style="text-align: right;">Page 19</p> <p>1 we -- we obviously want discovery to end. 2 However, the Judge's last -- in response 3 to our motion to ascertain status, he did 4 indicate he was going to rule soon. I don't 5 know what "soon" is. 6 MR. STREET: Oh, did he -- I didn't 7 see, I was gone. Did he -- 8 MS. SANDERS: Yeah, he -- he -- he 9 responded to the motion to ascertain status, 10 but he didn't rule. He said that he's aware, 11 that he plans to rule soon, but, you know, he's 12 got an enormous criminal docket and 350 civil 13 cases and he's been in the middle of a 14 one-month jury trial. 15 So that was the -- the status was he's 16 been really busy, so -- but he did indicate 17 that he intends to rule. So given that, an 18 extension might make sense. 19 MR. STREET: All right. And if you 20 guys want to agree to the extension, then we 21 can agree to move Mr. Ramsey's deposition. 22 MS. SANDERS: Okay. All right. 23 Well, let me -- let me look at that, and I 24 will -- I'll talk to my client. I'll send you 25 an e-mail.</p>
<p style="text-align: right;">Page 18</p> <p>1 MS. SANDERS: Do a 30(b)(6) on it? 2 MR. STREET: Yes. 3 MS. SANDERS: Yeah. 4 MR. STREET: That might just be 5 easier for everyone. 6 MS. SANDERS: I think that Armando's 7 included that. 8 MR. STREET: Okay. 9 MS. SANDERS: But you can -- I'll go 10 back and look. 11 MR. STREET: Okay. 12 MS. SANDERS: I'll look at the topics 13 you already included. 14 MR. STREET: I think we can be more 15 specific at the time anyway, so... 16 MS. SANDERS: Okay. All right. If 17 you want to just let me know what the 30(b)(6) 18 topics are -- 19 MR. STREET: Uh-huh. 20 MS. SANDERS: I guess we should 21 figure out the extension first. 22 MR. STREET: Right. 23 MS. SANDERS: Okay. Yeah, I'll look 24 at the calendar, too. And I'm not inclined to 25 agree to any extension on discovery because</p>	<p style="text-align: right;">Page 20</p> <p>1 MR. STREET: All right. But we have 2 to -- I mean, it has to come down as an order, 3 you know what I'm saying? 4 MS. SANDERS: I know. 5 MR. STREET: I can't strike it just 6 as a floating motion -- 7 MS. SANDERS: Yeah, I know. 8 MR. STREET: -- just because of what 9 we have to do. And that's not me being a jerk, 10 that's just me not being able to... 11 MS. SANDERS: No, I don't think 12 that -- I don't think we can do anything short 13 of her agreeing and ordering it. 14 MR. STREET: Yeah. 15 MS. SANDERS: So I agree with you. 16 MR. STREET: Okay. 17 MS. SANDERS: I don't think that -- I 18 don't think you and I can agree to extend it -- 19 MR. STREET: Exactly. 20 MS. SANDERS: -- without an order. 21 She has been pretty fast to rule, though. 22 MR. STREET: She has. 23 MS. SANDERS: So I think that it 24 won't -- it shouldn't be an issue. 25 MR. STREET: And I don't think she'd</p>

1 be surprised by it, either.
 2 MS. SANDERS: Yeah.
 3 MR. STREET: Based on what she's said
 4 before about, you know, how she basically told
 5 us, I feel like, how she wanted it to be filed.
 6 So I think she expects it to be filed if she's
 7 telling us how she wants it to be filed.
 8 MS. SANDERS: What did she say? I
 9 don't remember.
 10 MR. STREET: Oh, she just said make
 11 sure you get it in seven days before the
 12 deadline and --
 13 MS. SANDERS: Right, that's correct.
 14 Yeah.
 15 MR. STREET: So...
 16 MS. SANDERS: Okay. Well, I'll give
 17 you an answer today. I'll look -- I'll go look
 18 and at least let you know whether we're going
 19 to oppose it or not, and then you can get it
 20 filed --
 21 MR. STREET: Okay.
 22 MS. SANDERS: -- well before her
 23 seven days.
 24 Okay. Now, on the -- on the sanctions
 25 motion or order, I've gone through and I've

1 MS. SANDERS: Okay.
 2 All right. So when I read her order, I
 3 think what I'm supposed to do is do an
 4 individual -- like, supplement each one
 5 individually that asks for people. So I've
 6 narrowed those down, and I want to make sure
 7 this is -- this is right.
 8 So Number 1, I think, is pretty simple.
 9 That one, she asks for the -- or you ask for
 10 the name, address, job title of every person
 11 who provided information in the
 12 interrogatories. I mean, that's easy, right?
 13 MR. STREET: Uh-huh.
 14 MS. SANDERS: That is what it is,
 15 okay. So that one is -- you know, I don't
 16 think there's a need to supplement that one.
 17 Number 2, I think, is the one that you --
 18 this is what I think you filed the sanctions
 19 motion on. And I took her response to
 20 sanctions motion as, like, a motion to compel,
 21 like an order compelling. So I want to make
 22 sure that I'm addressing the right one.
 23 So Number 2 says, "Identify each person,"
 24 I'm not going to read the whole thing.
 25 MR. STREET: Uh-huh.

1 looked at the interrogatories, which I -- I
 2 didn't make you a copy. Do you have them? Do
 3 you have -- can you pull them up?
 4 MR. STREET: I can pull them up here,
 5 I think so.
 6 MS. SANDERS: Okay. So I'm looking
 7 at the original one, and it's Lampo's responses
 8 to Plaintiff's first set of interrogatories, or
 9 you can look at the ones you sent. It doesn't
 10 matter, it's -- because I want to ask you about
 11 the actual interrogatory and not my response,
 12 so whichever one you've got is fine.
 13 MR. STREET: That's fine. Is this
 14 Lampo's responses?
 15 MS. SANDERS: Uh-huh, yeah.
 16 MR. STREET: Okay. Then do you
 17 remember the date on those?
 18 MS. SANDERS: Should be sometime
 19 around September 23rd. That's when they were
 20 signed. Let me look at the certificate of
 21 service.
 22 Yeah, I sent them to you on
 23 September 23rd.
 24 MR. STREET: Okay. I've got them
 25 pulled up.

1 MS. SANDERS: "Who has knowledge of
 2 relevant facts relating to the subject matter
 3 of the litigation and state in detail the
 4 nature of each person's knowledge." There's
 5 more, but -- so that's Number 2.
 6 I just want to go over the other ones,
 7 because I think all the other ones are
 8 answered. 2 is the one that I think is what
 9 the real contention is.
 10 Okay, then the next one that asks for
 11 individuals is Number 5. That one is -- I do
 12 want to talk about that one, but I think that
 13 one's pretty straightforward. It says,
 14 "Identify all persons involved in making the
 15 decision to terminate, suspend," I think that's
 16 just a typo, because he wasn't suspended,
 17 "Plaintiff's employment and specifically their
 18 particular actions taken." You know, so that's
 19 a third one, I think he's asking for people.
 20 And then I think that's it, but let me
 21 just double-check.
 22 Oh, well, we should talk about Number 9.
 23 MR. STREET: And Number 7.
 24 MS. SANDERS: Okay, did I skip one?
 25 Yeah, to identify the statements.

1 MR. STREET: And who made them.
 2 MS. SANDERS: Okay, let me circle
 3 that one.
 4 Okay. And then Number 9 is the
 5 investigations.
 6 MR. STREET: Yes.
 7 MS. SANDERS: Which I think we
 8 have -- I think all that's in there, but I can
 9 put it in the form of an interrogatory
 10 response.
 11 And I think that's it. We're asking for
 12 something about individuals. I have a lot of
 13 responses where I include individuals, but I'm
 14 trying to take the supplemental response, fit
 15 it into each one. I think that's what she was
 16 telling me to do.
 17 MR. STREET: That's what I think she
 18 was, too.
 19 MS. SANDERS: Yeah. So the only one
 20 that I think is -- yeah, we probably do need to
 21 talk about 7, but I think 2. I need to know --
 22 I'd like to talk to you about 2, because if
 23 it's knowledge of relevant facts relating to
 24 the subject matter of the litigation, I don't
 25 know how to -- I don't know how to narrow that

1 thing to do is take the complaint and look at
 2 the counts, like what -- let's start with that.
 3 Like some of the stuff in here is where Lampo
 4 is located. I mean, I don't think you want --
 5 MR. STREET: No, you're right, I
 6 don't want that.
 7 MS. SANDERS: Right. You don't want
 8 people with knowledge of Lampo being an LLC,
 9 right?
 10 MR. STREET: Right.
 11 MS. SANDERS: So my thought was to
 12 look at the counts, starting with Paragraph
 13 330. The first count is retaliatory discharge.
 14 MR. STREET: Let me look at the fact
 15 section.
 16 MS. SANDERS: Yeah.
 17 MR. STREET: All right, this is
 18 the -- not the amended complaint. Where is
 19 that?
 20 MS. SANDERS: Yeah, I think the first
 21 amended complaint is the operative one.
 22 MR. STREET: Okay.
 23 MS. SANDERS: Because that's the
 24 one -- that's the last one you filed.
 25 MR. STREET: This is probably it.

1 down. I mean, that's what I was doing. I was
 2 giving you people that knew about him, his
 3 employment, and I was looking at it from -- JB
 4 Wagner is not a supervisor, but JB Wagner is,
 5 like, kind of like a lead, you know. He was
 6 like a supervisor in training, sort of.
 7 MR. STREET: Uh-huh.
 8 MS. SANDERS: So he was pretty
 9 familiar with Amos's performance. That's why I
 10 included him. But the rest of them were like
 11 supervisory roles who could impact his
 12 employment.
 13 The issue that I'm struggling with is
 14 there's, you know, a lot of allegations in the
 15 complaint. And so, I could narrow it by
 16 looking at the actual counts, but even then, I
 17 don't know -- I mean, honestly, I think anybody
 18 that ever worked at Lampo could have knowledge,
 19 right?
 20 So I don't know -- I've done my best to
 21 answer it. It obviously wasn't good enough, so
 22 I need -- I want to make it right, I want to
 23 get it right, and I -- I don't know exactly how
 24 to answer it.
 25 So if I'm looking at -- and maybe the

1 MS. SANDERS: It's Document 21 in the
 2 Court's filing system, if that helps. You
 3 filed it on March 4th, '22.
 4 MR. STREET: Well, that's -- this is
 5 it. We didn't get the stamp copy. We have the
 6 PDF copy, but it's March.
 7 MS. SANDERS: Okay. Because that --
 8 yeah.
 9 MR. STREET: It was created March of
 10 '22.
 11 MS. SANDERS: Yeah, and it's a --
 12 titled the First Amend Complaint.
 13 MR. STREET: Right.
 14 I mean, I think all that -- the first two
 15 pages, no, that's --
 16 MS. SANDERS: Okay.
 17 MR. STREET: -- none of that.
 18 The factual allegations, though, I think
 19 that would apply. And that's a lot, I know,
 20 but...
 21 MS. SANDERS: Uh-huh. So --
 22 MR. STREET: You know, it also -- I
 23 think that's probably going to be a lot of the
 24 same people. Like it may not be a lot of
 25 people, but just the people who have knowledge

1 of a lot of these facts.
 2 MS. SANDERS: Uh-huh.
 3 So this -- okay, so Kimberly Rudolph, for
 4 example, is listed as the recruiter. She no
 5 longer works for us. I don't -- I've not
 6 talked to her. I don't know if she remembers
 7 Brad Amos. But, I mean, you obviously know
 8 about her, you know who she is.
 9 MR. STREET: Uh-huh.
 10 MS. SANDERS: I don't know if she
 11 knows anything. So like, how would you --
 12 like, what would your exception be of me on how
 13 to address something like Kim Rudolph?
 14 MR. STREET: I mean, if she knows
 15 something about the facts of the case that you
 16 know about --
 17 MS. SANDERS: Yeah.
 18 MR. STREET: -- then...
 19 MS. SANDERS: Yeah, I don't know if
 20 she does. That's the thing, like, nobody's
 21 talked to her.
 22 MR. STREET: Uh-huh.
 23 I mean, I would say list them and be
 24 careful, you know, and put them on there if
 25 they may not, than not include them and have

1 Kimberly Rudolph, I agree that she -- that's
 2 the other thing. See, we've never filed an
 3 answer because we filed a motion to dismiss.
 4 MR. STREET: Uh-huh.
 5 MS. SANDERS: If I had filed an
 6 answer in this case, you would know that I --
 7 I'd probably admit Number 20, Ms. Rudolph had
 8 phone interviews with Plaintiff. Do you see
 9 what I mean?
 10 MR. STREET: Uh-huh.
 11 MS. SANDERS: So I can tell by those
 12 documents I gave you on the interview and
 13 recruiting, she clearly talked to him.
 14 MR. STREET: I think, you know, if
 15 you would list them, I think the best thing to
 16 do would be to list them all and then I just
 17 show my client and say -- because he was -- if
 18 the client would inform me that all she did was
 19 interviewed me on the phone the first time --
 20 MS. SANDERS: Uh-huh.
 21 MR. STREET: -- you know, then --
 22 MS. SANDERS: Yeah.
 23 MR. STREET: Then that's it, so...
 24 MS. SANDERS: Because you had
 25 actually -- she was one of the first ones that

1 them do it, but -- and -- does that make sense?
 2 I know that was blah, blah, blah, but...
 3 MS. SANDERS: Well, and I think this
 4 is why we got wrapped around the axle on
 5 investigation, which the Judge called us out on
 6 that, but -- but we had different questions.
 7 Like, there was -- one question was about who
 8 do we investigate -- like, who do we interview,
 9 right?
 10 MR. STREET: Uh-huh.
 11 MS. SANDERS: The other question was
 12 whose got knowledge. I don't think we were off
 13 base in talking about both of those things,
 14 because obviously whoever we interview, we know
 15 if they've got knowledge or not, right?
 16 So I don't think those two things -- the
 17 Judge, primarily me, came down on me for
 18 conflating those things. You've asked both of
 19 those questions, and I think they're relevant
 20 because if I haven't -- if we haven't
 21 interviewed someone or talked to them, we don't
 22 know if they know anything.
 23 MR. STREET: Uh-huh.
 24 MS. SANDERS: So that's what I'm
 25 trying to figure out, is what -- I mean,

1 you identified as somebody to depose.
 2 MR. STREET: Okay.
 3 MS. SANDERS: All right, so let's
 4 keep going.
 5 I can -- because I do acknowledge that
 6 she was a recruiter, the notes show that she
 7 did talk to Brad Amos. Does she remember him,
 8 I don't know. So I would just have to qualify
 9 that --
 10 MR. STREET: Okay.
 11 MS. SANDERS: -- you know.
 12 Okay, so then we get into DiCicco, that
 13 makes sense. I'm on Page 4, starting with 26.
 14 Okay. So here he's talking about
 15 interviews with various people through a 60-day
 16 process. Everybody that interviewed him, those
 17 notes would be in the Jobvite, which that was
 18 produced -- let me pull up my own internal
 19 production log.
 20 MR. STREET: Uh-huh.
 21 MS. SANDERS: Then I can give you
 22 some context of when stuff was actually
 23 produced.
 24 So -- let's see. Sorry, I had the wrong
 25 thing. Okay.

1 Okay. All right, so early on, I provided
 2 you with -- Jobvite is the -- that's what they
 3 track other applicant data, right? Their
 4 interview process is done in Jobvite.
 5 Okay, so you've got some of those in the
 6 initial disclosures. What I realized in --
 7 later on was that there were multiple tabs in
 8 Jobvite, so you didn't have every document and
 9 every tab. I didn't know that until I started
 10 looking at Jobvite, and I realized stuff was
 11 missing.
 12 So on October 24th -- yeah, 24th of
 13 October, that's when I gave you the complete
 14 Jobvite, so you had all the evaluations and
 15 notes. So you would have seen in the initial
 16 disclosures and then in October 20 -- the --
 17 October 24th everybody that interviewed him.
 18 They would have made notes in Jobvite.
 19 MR. STREET: Uh-huh.
 20 MS. SANDERS: So presumably, those
 21 people at some point knew something about Brad
 22 Amos.
 23 MR. STREET: Uh-huh.
 24 MS. SANDERS: The only ones that I
 25 know about are those that I've disclosed, like

1 MS. SANDERS: Okay. So I can
 2 reference -- I'll reference the people in
 3 Jobvite, because whoever's in there presumably
 4 interviewed him.
 5 MR. STREET: Right.
 6 MS. SANDERS: Right?
 7 But I don't -- I don't know if they
 8 remember him, right?
 9 Okay. All right. Okay. I think that
 10 gets us through most of that page. Yeah,
 11 because all of Page 4 is about his interview.
 12 Okay, take a look at Number 40.
 13 "Plaintiff, through his own interview research,
 14 had also found certain reviews and local
 15 community" -- or, I'm sorry, "commentary
 16 indicating that Lampo was more cult-like than
 17 Christian."
 18 MR. STREET: Uh-huh.
 19 MS. SANDERS: I mean, I don't -- I
 20 don't -- I don't know of anyone who would --
 21 MR. STREET: I think that's talking
 22 about something Plaintiff did.
 23 MS. SANDERS: Yeah. Okay.
 24 MR. STREET: So it would be a
 25 question for him.

1 DiCicco. I think Laura Johnson, Luke LeFevre.
 2 I don't think JB Wagner interviewed him, but
 3 those three did.
 4 So there could be other people in that
 5 Jobvite. Like, for example, you had -- I think
 6 it was Larry -- I don't know his name, maybe
 7 Anderson?
 8 MR. STREET: Larry Anderson.
 9 MS. SANDERS: Yeah. That's somebody
 10 you identified early on as somebody you wanted
 11 to depose. He, I'm sure, interviewed your
 12 client. So do you want -- do you want me to
 13 distinguish between the ones who are in Jobvite
 14 who may have interviewed him that I don't know
 15 if they know anything and then those that did
 16 interview him that I know know something? Do
 17 you see what I mean?
 18 MR. STREET: Yeah. Yeah, I mean --
 19 you know, I mean, as long as it is -- the
 20 information provided by each person lets me
 21 look at it and see, well, does this person have
 22 something that's worth deposing them over or
 23 not --
 24 MS. SANDERS: Yeah.
 25 MR. STREET: -- then that's fine.

1 MS. SANDERS: Okay.
 2 MR. STREET: Maybe not for one of
 3 your people.
 4 MS. SANDERS: Yeah, okay.
 5 All right. Again, you have Larry
 6 Anderson listed in here. Larry Anderson, by
 7 the way, no longer works at Ramsey. So I -- I
 8 don't know what he does and doesn't know.
 9 MR. STREET: So is it okay for me to
 10 put in this motion today that -- after our
 11 talk, what the Judge wanted us to have, that it
 12 looks like some of the people who you may
 13 supplement with are people who, if we want to
 14 depose, it's not as simple as just calling you
 15 and saying, have them get there. I have to
 16 subpoena them, find a date. Do you know what I
 17 mean? Like, it's not a party to the lawsuit.
 18 MS. SANDERS: Yeah. Some of them,
 19 though, like -- so the first time you wanted to
 20 depose Larry Anderson -- I can get in touch
 21 with Larry. Like, I know where he is. We
 22 reached out to him to schedule it.
 23 MR. STREET: Uh-huh.
 24 MS. SANDERS: So I don't think it's
 25 as simple as saying, like -- I mean, some of

1 them, like Luke LeFevre no longer works there.
 2 MR. STREET: Right.
 3 MS. SANDERS: But, I mean, he was an
 4 operating board member. He's easy to connect
 5 with, you see what I mean?
 6 MR. STREET: Right, but some of them
 7 may not be.
 8 MS. SANDERS: That's true, yeah.
 9 MR. STREET: Okay. So I'll just say
 10 -- that's all I'm saying. I'm not saying they
 11 all are going to be like that, but --
 12 MS. SANDERS: Yeah.
 13 MR. STREET: -- some of them may
 14 issuance of subpoena, et cetera.
 15 MS. SANDERS: Yeah. I think -- I
 16 think most of them will prefer to cooperate,
 17 you know, rather than be subpoenaed --
 18 MR. STREET: Yeah.
 19 MS. SANDERS: -- but I can't speak
 20 for them.
 21 The only ones I can speak for are Larry
 22 Anderson and -- and Kimberly Rudolph, who --
 23 the -- the two that you -- the two that you
 24 early on wanted to depose. I reached out to
 25 both of them, was able to find them, they were

1 see, back on Page 6, we're getting back into
 2 the interview process.
 3 Okay, 51, Lampo made an offer to
 4 Plaintiff for an annual salary of 90,000 with a
 5 \$10,000 relocation bonus. I don't -- I think
 6 that Armando in HR -- I don't know if Armando
 7 was the one who approved that. Nobody knows.
 8 We just know that he got that offer. You know
 9 what I mean? So I -- I don't think --
 10 MR. STREET: I mean, that's not a
 11 disputed fact. My client testified to it.
 12 MS. SANDERS: No, that's not a
 13 dispute.
 14 MR. STREET: Then you don't -- that's
 15 fine.
 16 MS. SANDERS: Yeah.
 17 Well, actually, 90,000 might be off, but
 18 it doesn't matter.
 19 MR. STREET: Uh-huh.
 20 MS. SANDERS: I mean, I think -- if I
 21 recall, I'm not sure he made 90. I thought he
 22 made 90 total. Doesn't matter, the point is
 23 there's going to be an offer in there that says
 24 how much he got.
 25 MR. STREET: Right.

1 cooperative. So I don't think, like, those two
 2 are an issue.
 3 MR. STREET: Okay.
 4 MS. SANDERS: I don't know -- you
 5 know, I don't know about who else might be on
 6 here.
 7 All right. Okay, so I think then we get
 8 down to 47. So 47, I think we're moving into a
 9 new -- we've moving into now where Defendant
 10 Ramsey said on the radio that Lampo had been
 11 voted the best place to work. I don't know how
 12 to list people who know that.
 13 MR. STREET: That's going to be --
 14 that's fine.
 15 MS. SANDERS: Okay.
 16 MR. STREET: I get that.
 17 MS. SANDERS: Okay.
 18 MR. STREET: Everyone there probably
 19 realized that.
 20 MS. SANDERS: Yeah. I mean, that's
 21 it. Like, I think there's -- I'd have to give
 22 you a roster of everybody that worked there,
 23 so...
 24 MR. STREET: I understand.
 25 MS. SANDERS: Okay. So then, let's

1 MS. SANDERS: I just don't know who
 2 offered that offer. See what I mean? But
 3 you've got Armando, who's the head of HR.
 4 MR. STREET: That's fine with that
 5 one.
 6 MS. SANDERS: All right. 53, 54,
 7 okay, the on-boarding process. On 54, looks
 8 like for the next several ones you're talking
 9 about the on-boarding process. Again, we don't
 10 know who on-boarded him, so I don't know who to
 11 list there.
 12 Armando, again, is the head of HR. He
 13 can tell you about the on-boarding process, but
 14 nobody knows exactly who was there to on-board
 15 him.
 16 MR. STREET: Uh-huh. Okay.
 17 MS. SANDERS: If I -- actually, there
 18 could be something in the documents that say
 19 that. I haven't read all the e-mails, but
 20 there might be something in the e-mails, like
 21 in the first e-mails with him, right when he
 22 started, there might be something about
 23 on-boarding. But based on my investigation, I
 24 don't know who on-boarded him, so what -- what
 25 do you want me to tell you there?

1 MR. STREET: Just whatever you can
2 find out.
3 MS. SANDERS: Okay. Like, I would
4 defer to HR.
5 Okay. Then like 57, he said it was an
6 indoctrination process. I mean, I think
7 offering Armando -- Armando is in charge of the
8 on-boarding, so I think we're good on that.
9 And he was in charge of it at this time, too,
10 so...
11 The Ramsey way, I'm not sure what that
12 means. So I don't know who to offer -- I
13 don't -- I don't know who has knowledge of
14 this. Again, this is the kind of thing that
15 you could ask everybody that works there.
16 MR. STREET: I think, you know, in
17 the complaint, it's written in the Plaintiff's
18 voice. When he says things like that, it's
19 from the Plaintiff.
20 MS. SANDERS: Okay. All right.
21 MR. STREET: I mean, I feel sure
22 Mr. -- Defendant Ramsey does not agree with our
23 claim that the Ramsey way encourages expressing
24 praise for Mr. Ramsey constantly.
25 MS. SANDERS: No, right.

1 him, but I don't think they have a record of
2 it.
3 Like, I think the way they on-board is
4 whoever is available to meet and greet, you
5 know, HR leads the whole thing, so there's
6 probably going to be people from the operating
7 board that come in. Dave Ramsey probably comes
8 in and says, welcome to Ramsey, I -- I don't
9 know, but it's -- it's a general format that
10 they follow, but I don't know that we have a
11 list of exactly who on-boarded him, so I think
12 giving you Armando is the best I can do on
13 that.
14 But if I figure that out or if you see it
15 in the documents --
16 MR. STREET: Or if Armando tells me
17 someone.
18 MS. SANDERS: Right, exactly. If
19 Armando figures it out between now and when you
20 depose him, then we'll know that.
21 Okay. 67, Lampo encouraged Plaintiff to
22 be Facebook friends with all of his coworkers
23 and supervisors. I'm not sure who that is, so
24 I don't have anybody to identify.
25 There is an e-mail in 68, one of the

1 MR. STREET: So that's an opinion of
2 the Plaintiff in this matter.
3 MS. SANDERS: Yeah, I don't have
4 anybody that would -- has knowledge of that,
5 right?
6 MR. STREET: So, I mean, that's clear
7 to me if it's just something that is written,
8 like, in the Plaintiff's voice, something he
9 says that this is the way he thinks it is and
10 what he feels it is, then that's something we
11 got to prove.
12 MS. SANDERS: Yeah.
13 MR. STREET: I get it, but our guy is
14 the witness for those.
15 MS. SANDERS: Okay. So I think --
16 and I think most of this is the on-boarding
17 process, you know. So that -- I think giving
18 you Armando was the best I could do because he
19 can tell you what the on-boarding process is.
20 I have asked if we know specifically
21 about Brad Amos's on-boarding. There were a
22 number of people on-boarded at the same time,
23 so what I've been trying to do is figure out
24 who was on-boarded with him, because that'd
25 maybe give me some clues as to who on-boarded

1 e-mails that was produced where Lampo
2 encouraged Plaintiff's wife -- actually, I
3 think you produced it. I think it was a social
4 media message, and that actually -- I think
5 that message came from Armando Lopez's wife --
6 MR. STREET: Okay.
7 MS. SANDERS: -- who -- but I
8 don't -- I mean, she doesn't work for us, so I
9 don't know if she has any knowledge of
10 Ms. Amos. I don't -- I don't know if she knows
11 that, but I do think you produced, like, a
12 social media message.
13 So if it's not somebody that's acting on
14 behalf of Lampo or that I haven't interviewed
15 and we haven't interviewed, but you see it in
16 the documents, is that something you want me to
17 list?
18 MR. STREET: I mean, if you know
19 about it, you know, I...
20 MS. SANDERS: Yeah. Okay. Yeah, I
21 don't know -- I don't know that. I think you
22 produced it, because I think it was a social
23 media message. Okay.
24 MR. STREET: And I don't mind, like I
25 said, if you want to -- you know, I know

1 there's a part of the motion that says, you
 2 know, you can't generally point to all the
 3 documents, but if you do point to some
 4 documents --

5 MS. SANDERS: Yeah.

6 MR. STREET: -- specifically by Bates
 7 stamp number, then that's fine with me.

8 MS. SANDERS: Yeah, because I -- I
 9 mean, I have a log of everything produced.

10 MR. STREET: Yeah. I'm just
 11 saying --

12 MS. SANDERS: The only time --

13 MR. STREET: I'm just saying when you
 14 produce your response --

15 MS. SANDERS: Yeah.

16 MR. STREET: -- don't just say it's
 17 in --

18 MS. SANDERS: The documents.

19 MR. STREET: -- yeah, Documents
 20 Number 21,000 to 48,000.

21 MS. SANDERS: Uh-huh.

22 MR. STREET: You know, say it's on
 23 this, this, this or this --

24 MS. SANDERS: Yeah, I should --

25 MR. STREET: -- or reasonable ranges,

1 were a few pages. And in a couple of those
 2 pages, you'll see, like, David DiCicco with
 3 kind of like a work plan.

4 MR. STREET: Uh-huh.

5 MS. SANDERS: And it shows people who
 6 were working on the project. I don't know if
 7 those people know anything about Brad's
 8 trailer. I don't know about that, but I can
 9 point you to those documents that DiCicco has
 10 which shows the workflow.

11 MR. STREET: Uh-huh.

12 MS. SANDERS: Do you see what I mean?

13 MR. STREET: Uh-huh.

14 MS. SANDERS: I've not talked to any
 15 of those people other than DiCicco, but that
 16 seems to me to be a response, like, when you're
 17 wanting to know the technical -- like the
 18 specific, oh, when you say in here the specific
 19 things related to a trailer, I think those
 20 DiCicco workflows are the best.

21 And I don't even know the people that are
 22 listed in there, but you can at least see the
 23 people that are listed in there, and Brad
 24 presumably knows those people, right?

25 MR. STREET: Right.

1 and that's fine.

2 MS. SANDERS: I should be able to do

3 that pretty well. The -- there was a stack of
 4 documents that we didn't review -- we reviewed
 5 it only for privilege, just because of time
 6 constraints, but I think we've reviewed it
 7 since then, so I'll go back and I can look at
 8 that.

9 All right, let's keep going. I think we
 10 don't -- we talked about the Lampo ladies on
 11 Page 8.

12 Okay. All right, getting down to 74
 13 where it says, "Plaintiff cut a trailer for
 14 Lampo's new major podcast Borrowed Future." In
 15 the documents, you'll see -- I know that -- and
 16 they're going to be in several places. I don't
 17 know if you recall this, but literally, I think
 18 it was on the last day that we had to produce
 19 the set that we were required to produce in the
 20 motion to compel.

21 I had our vendor do a sweep, just to make
 22 sure nothing got missed, because it was -- it
 23 was a large volume and you're almost always
 24 going to have something that didn't get
 25 captured. There weren't very many, but there

1 MS. SANDERS: Because he was working
 2 with them. He might have listed some of them,
 3 but I think that's the best source for who
 4 would know about the trailer or the
 5 documentary.

6 MR. STREET: Okay.

7 MS. SANDERS: Does that make sense?

8 MR. STREET: Uh-huh.

9 MS. SANDERS: Because I don't want to
 10 list everybody that work in his department
 11 because they probably have nothing to do with
 12 the trailer or the documentary. Do you see
 13 what I mean?

14 MR. STREET: Yeah.

15 MS. SANDERS: Plus, he knows who he
 16 worked with. So -- all right.

17 And the reason I pointed out that last

18 set is because there are so few in there, like,
 19 if you pull up the very last set I sent to you,
 20 which I think is Volume 11 -- let me make sure.
 21 Yeah, Volume 11 was the sweep to make sure that
 22 all -- all documents marked responsive got
 23 pulled. I think some of them -- I think most
 24 of them are probably duplicates, but that's a
 25 good place to look for those workflows, because

1 there's less than 100 documents in that set.
 2 Do you see what I mean?
 3 MR. STREET: Uh-huh.
 4 MS. SANDERS: And you'll see them,
 5 they're very -- they're distinct because it'll
 6 be an e-mail with David DiCicco, and in the
 7 middle it will be like a chart. There's, I
 8 think, several more of those, but that's the
 9 easiest place to find them, if that makes
 10 sense.

11 Okay. Okay, so there's -- there's some
 12 allegations about his trailer being linked by
 13 Lampo. I've looked into that, and I don't -- I
 14 can't find anything on that. So I think the
 15 best source for that is probably -- you've
 16 already got them -- Luke, Laura, they're the
 17 ones that are going to know that.

18 MR. STREET: Uh-huh.

19 MS. SANDERS: So I can't come up with
 20 anybody else that knows that.

21 On 81 where you say, provided assistance
 22 to the video team, whether Amos provided
 23 assistance to the video team, that -- again,
 24 I -- something like that is pretty vague.

25 Like, I don't know who the video team is, but I

1 Again, I've identified the people who
 2 could do something about his work performance.
 3 His coworkers that might know about his work
 4 performance, I don't know that. I don't know
 5 who they are. I'm assuming he does, but are
 6 you looking for that? Are you looking for a
 7 list of his coworkers?

8 MR. STREET: Yes, I would think
 9 that...

10 MS. SANDERS: Okay. Again, I have no
 11 idea if they have knowledge.

12 MR. STREET: Let me see, you're
 13 talking about 82 --

14 MS. SANDERS: To 87.

15 And here, like, for example, he came in
 16 early, aided other teams.

17 MR. STREET: I think if you know
 18 something that disputes what he claims here --

19 MS. SANDERS: Yeah.

20 MR. STREET: -- if there are
 21 witnesses who dispute that, then they should be
 22 identified, but otherwise --

23 MS. SANDERS: Yeah.

24 MR. STREET: -- again, I think this
 25 is my client speaking in his voice.

1 think JB Wagner and DiCicco -- maybe not
 2 DiCicco, but JB Wagner -- DiCicco was pretty
 3 focussed on the documentary, right, so he's not
 4 going to know --

5 MR. STREET: Right.

6 MS. SANDERS: -- much about Amos
 7 beyond that.

8 JB Wagner wasn't a supervisor but knows
 9 probably more about his bigger picture, and
 10 certainly Laura Johnson does. So that's -- I
 11 don't -- I don't know anybody other than that
 12 on there, whether he provided assistance to the
 13 video team, because I'm not sure who the video
 14 team is.

15 MR. STREET: Okay.

16 MS. SANDERS: Okay, then --

17 MR. STREET: What paragraph was that
 18 again? I'm sorry.

19 MS. SANDERS: 81.

20 MR. STREET: Thanks.

21 MS. SANDERS: Okay, so then on Page
 22 9, we're talking about -- here you're talking
 23 mostly about -- well, half of that, going
 24 through 87, 82 through 87, it's talking about,
 25 like, his work performance.

1 MS. SANDERS: Okay, got it.
 2 Yeah, I think I've given you everybody on
 3 that. I mean, again, the only people I know of
 4 that know that are the people -- other than JB
 5 Wagner, the people who were actually
 6 responsible for him. JB observed him, so he is
 7 going to be -- he's going to fit into this
 8 category.

9 MR. STREET: Uh-huh.

10 MS. SANDERS: All right. So looking
 11 at -- I think we're good on the rest of that.
 12 I mean, you've got Armando.

13 Oh, here where it says they required
 14 him -- 93, they required employees to identify
 15 very specific personal issues in their personal
 16 lives, including any issues with their
 17 marriages. I'm not sure who you're talking
 18 about there.

19 MR. STREET: I don't remember if you
 20 asked him in his deposition or not, but...

21 MS. SANDERS: I think I did.

22 MR. STREET: I don't remember what he
 23 said, but whatever he said is who it is.

24 MS. SANDERS: Yeah. Yeah. So he
 25 talked about Laura Johnson with him.

<p>1 MR. STREET: Okay. 2 MS. SANDERS: I don't think he 3 referenced anyone else. 4 MR. STREET: Okay. 5 MS. SANDERS: I mean, we obviously 6 dispute that, but... 7 MR. STREET: Yeah. 8 MS. SANDERS: You know. 9 MR. STREET: And that's why I'm 10 saying I feel sure -- I don't remember, but I 11 feel sure it was something you brought up at 12 least, so... 13 MS. SANDERS: Yeah, okay. 14 MR. STREET: You know, if his 15 answer's in there, his answer's in there. 16 MS. SANDERS: All right. Then like 17 95, and this -- the answer to this one will 18 affect some of these others, where he says 19 Lampo required all its employees to participate 20 in weekly one-on-one meetings, I don't -- I 21 think you already asked Armando that. 22 MR. STREET: Uh-huh. 23 MS. SANDERS: But I don't think 24 you're asking me every supervisor who conducted 25 one-on-one meetings.</p>	<p style="text-align: right;">Page 53</p> <p>1 MR. STREET: I'm not. 2 MS. SANDERS: Okay. All right. 3 That's it on that page. 4 Okay, now go down to Page 13. Okay, like 5 on 137, "Specifically in a 900-person meeting, 6 Mr. Ramsey stated that fear of working in the 7 office because of COVID demonstrated a weakness 8 of spirit." We don't think anyone has 9 knowledge of that, but in the 900-person 10 meeting, you're not asking for like -- 11 MR. STREET: 900 people? 12 MS. SANDERS: Right. 13 MR. STREET: No. 14 MS. SANDERS: Okay. Because that 15 would be -- I mean, it would be the employee 16 roster, but that doesn't seem -- that doesn't 17 seem to make sense; although, you know... 18 All right. So then -- okay. So 140, 19 "Lampo was controlled by Mr. Ramsey. To an 20 extent, they are alteregos of each other." 21 Then 141 where it goes through, like, 22 Ramsey and Lampo. I mean, that's something 23 that we obviously dispute, but I don't know who 24 would have knowledge of that. 25 MR. STREET: Mr. Ramsey.</p>
<p>1 MR. STREET: No, I think it'll just 2 be for my client. 3 MS. SANDERS: For him, okay. Okay. 4 Okay. All right, then down to 103. So 5 this is when he gets into the endorsed local 6 provider. Are you wanting information on the 7 endorsed local provider beyond the endorsed 8 local provider that was -- that he -- that he 9 reached out to to help sell his house? 10 MR. STREET: I think it would be more 11 about how the ELP program works. 12 MS. SANDERS: Okay. Okay. All 13 right. 14 All right, moving on to Page 11. This is 15 going to go a lot faster now that we've, you 16 know, had a few of these. 17 MR. STREET: Yeah. 18 MS. SANDERS: I think we're good on 19 11. 20 Page 12. Okay, so, for example, 121, 21 "Throughout early spring of 2020, the spread of 22 Coronavirus/COVID-19 became worldwide news and 23 the concern of many American citizens." I 24 don't think you're asking me to identify 25 everybody that knows that.</p>	<p style="text-align: right;">Page 54</p> <p>1 MS. SANDERS: Well, there's also the 2 operating board. 3 MR. STREET: Uh-huh. 4 MS. SANDERS: And you've already got 5 Luke LeFevre, so you have Armando, Luke. 6 MR. STREET: Yeah. I mean, you could 7 list these folks, but we're still only limited 8 to who we can depose, so... 9 MS. SANDERS: Yeah. 10 Okay. All right. I think that's the 11 same throughout. 12 146 where his stated beliefs -- Ramsey's 13 stated beliefs regarding COVID were amplified 14 on his radio show numerous times, obviously we 15 don't know who all heard that. 16 MR. STREET: Right. 17 MS. SANDERS: I'm on Page 15 now. I 18 think this one's -- I think this one's pretty 19 straightforward. Yeah. 20 Okay, Page 16. I think most of them from 21 here on out are specific about his termination. 22 There is one on here that I'll ask you about. 23 182, for example, Governor Lee issued an 24 executive order Number 17 directing Tennesseans 25 to work from home whenever feasible.</p>

<p style="text-align: right;">Page 57</p> <p>1 MR. STREET: I'm not going to depose 2 Governor Lee. 3 MS. SANDERS: Okay. 4 MR. STREET: Even though the office 5 is right across the hall, but no. 6 MS. SANDERS: His office is right 7 across the hall? 8 MR. STREET: They have one there. I 9 think that -- you know, these big construction 10 projects go down. 11 MS. SANDERS: Oh, yeah, yeah. 12 MR. STREET: And then they have a -- 13 there's one at Vanderbilt, and they all have 14 the satellite offices, but Lee. 15 MS. SANDERS: Right, right. 16 MR. STREET: Lee -- what is it, Lee 17 Air-Conditioning? 18 MS. SANDERS: Oh, Lee Company. 19 MR. STREET: Lee Company, yeah. Lee 20 Company was right there. 21 MS. SANDERS: Oh, really? 22 MR. STREET: Yeah. Never saw the 23 governor, though. 24 MS. SANDERS: Yeah. I feel like he's 25 not in the day-to-day of the Lee Company.</p>	<p style="text-align: right;">Page 59</p> <p>1 MR. STREET: Right. 2 MS. SANDERS: But I think these are 3 all about the one-on-ones with Laura Johnson. 4 If they're about anyone else, you know, any 5 one-on-one with anyone other than Laura -- 6 MR. STREET: Right. 7 MS. SANDERS: We don't think there 8 were any others, other than -- he did have 9 one-on-ones with JB Wagner. 10 MR. STREET: I'll ask him today. 11 MS. SANDERS: Okay, I think that's 12 what that is, but just let me know. 13 MR. STREET: Okay. 14 MS. SANDERS: Okay, 24. 250, 15 allegation 250, I don't -- I don't know Shane 16 Emerson. I don't know if he still works at 17 Ramsey. So I don't know anybody with knowledge 18 of this. 19 If you're asking me for -- if there's a 20 staff meeting for the sole purpose of 21 apologizing, I've given you audios of all the 22 staff meetings, but I didn't listen to all of 23 them. 24 MR. STREET: Okay. 25 MS. SANDERS: So I feel like I can't</p>
<p style="text-align: right;">Page 58</p> <p>1 Okay, let's see. 2 Okay, like 186, in the edit bay, five 3 people were crammed into a small space with a 4 party-like attitude. I don't know who those 5 people are. I've tried to find out, I don't 6 know. 7 MR. STREET: If you don't know, you 8 can't list them. 9 MS. SANDERS: Okay. 10 Okay, I'm on Page 19. Okay, 19's easy. 11 20, I think 20's the same. Yeah. 12 21. Okay, on 226, this is just 13 clarification, I think 226, when it says, 14 "Plaintiff was informed that he had not been 15 on-boarded correctly," I think that's 16 attributed to Laura Johnson. 17 MR. STREET: Yes. 18 MS. SANDERS: Okay. 19 All right, now I'm on Page 22. 20 Okay, 23. On 23, you're talking about 21 meetings. I think you're talking about 22 one-on-ones with Laura Johnson. That's what 23 it -- I think that's -- you know, when you do a 24 numbered complaint, sometimes it's not clear in 25 each allegation.</p>	<p style="text-align: right;">Page 60</p> <p>1 really direct you to one, but I don't -- I 2 don't know what this incident is. But you do 3 have an audio of every staff meeting that was 4 there -- that -- that happened while he was 5 there and then before he got there and after he 6 got there, because you got them for that 7 two-year period. Again, I didn't listen to 8 them all, but... 9 MR. STREET: Okay. 10 MS. SANDERS: The staff meetings, 11 you've also got the agendas on those. 12 MR. STREET: Yeah. 13 MS. SANDERS: There's no agenda for 14 the devotionals. So you've got them, you've 15 got the audios, but you don't have -- there is 16 no agendas for those. 17 MR. STREET: Okay. 18 MS. SANDERS: So is there anything 19 else you're looking for on something like 250, 20 other than the audio of the staff meetings? 21 MR. STREET: No, not that I can think 22 of. 23 MS. SANDERS: Okay. Again, I haven't 24 listened to all those, so there could be 25 something in there, but I don't know.</p>

1 MR. STREET: Yeah, I don't have them
 2 all memorized, so I could go back and read
 3 through the summaries.

4 MS. SANDERS: Fair enough.

5 Okay, 254, "Lampo took adverse employment
 6 actions against all employees who requested to
 7 work from home." We obviously dispute that,
 8 but I think that to the extent there were any
 9 adverse employment actions, I mean, HR would
 10 know that, right?

11 MR. STREET: Okay.

12 MS. SANDERS: So if there's somebody
 13 in particular you're looking for there, let me
 14 know; otherwise, I would defer to HR.

15 MR. STREET: Okay. And if that's his
 16 answer, that's the answer.

17 MS. SANDERS: Yeah.

18 MR. STREET: So, I mean, I don't
 19 know, you know, what your employees know. I
 20 mean, I'm not in the position to tell you that
 21 any better than you are, so...

22 MS. SANDERS: Yeah, I don't know
 23 anything about this 254, but adverse employment
 24 actions, I know HR would know that, right,
 25 because they keep a record of that.

1 for the people who would be implementing policy
 2 regarding masks and social distance or not --
 3 or chose not to implement those policies.

4 MS. SANDERS: Okay. Yeah, that's
 5 going to be -- that would be Armando.

6 MR. STREET: Okay.

7 MS. SANDERS: Okay.

8 Okay, now I'm on Page 26. Okay, here you
 9 list Leo Gonzales and Shane Emerson. I'm
 10 assuming if you list people by name -- you also
 11 on 282 listed Daniel Tardy. These are not
 12 people that I've talked to or people that I
 13 think have information about Brad Amos. I'm
 14 assuming if you list them by name, then you
 15 know who they are.

16 MR. STREET: Uh-huh.

17 MS. SANDERS: You're not looking for
 18 me to list who you've got listed in the
 19 complaint?

20 MR. STREET: No, that's fair.

21 MS. SANDERS: Okay.

22 All right, now I'm on Page 27. I don't
 23 think there's -- that's fine.

24 28 -- all of those are pretty specific.
 25 28's the same, it's specific conversations

1 MR. STREET: Right.

2 MS. SANDERS: So like, if he wants
 3 to -- if he has a list of people and he wants
 4 specific information, I'll get it.

5 MR. STREET: Uh-huh.

6 MS. SANDERS: But so far, I don't --
 7 I don't have that, right?

8 Okay, Page 25. Again, this is getting
 9 into, like, conference meetings, staff
 10 meetings. People who have knowledge of how
 11 they behaved in staff meetings, that could be a
 12 thousand people. So I don't know who those
 13 people are, but are you asking for everybody
 14 that might have attended a conference meeting?
 15 If so, I just need to know what conference
 16 you --

17 MR. STREET: What number are you
 18 talking about again? I'm sorry.

19 MS. SANDERS: I'm on Page 25. It's
 20 really 259 through 262 and then also 264. This
 21 is where he's talking about mass gatherings,
 22 and technically anybody with knowledge of those
 23 gatherings would be whoever was there, but I
 24 don't -- I don't know who was there.

25 MR. STREET: I think we're looking

1 between him and Laura Johnson.

2 I'm on to Page 29 now. Okay, nothing on
 3 29.

4 On 30. Okay, Page 31 -- oh no, I'm
 5 sorry, Page 30, the bottom of 324, "Defendants
 6 have been publicly criticized by many sources
 7 for their anti-mask position and their aversion
 8 to social distancing."

9 Do you -- are you asking me to list
 10 somebody that has knowledge of that, or is
 11 that --

12 MR. STREET: If they do, if you have
 13 someone.

14 MS. SANDERS: Yeah, the publicly
 15 criticized, though, like, that's pretty broad.
 16 I don't know -- like, if there was an
 17 article -- I think you attached some articles
 18 to your complaint, but I didn't -- I didn't
 19 copy those. I didn't print those out. I think
 20 you, like, had a SEEN article maybe.

21 MR. STREET: Let's see, probably
 22 not -- we would have footnoted it, but -- and
 23 I'm not saying that's not something I provided
 24 since. But yeah, I mean, if it's someone there
 25 at -- who works for the Defendant, I'm not

1 asking for -- I can agree not to ask for
 2 people -- reporters, random people.
 3 MS. SANDERS: Yeah.
 4 MR. STREET: You know, but if it was
 5 an employee or ex-employee...
 6 MS. SANDERS: I would say most
 7 people -- like, if it was in the news, most
 8 people saw it, or if it was on Facebook,
 9 somebody criticized on Facebook.
 10 MR. STREET: Right.
 11 MS. SANDERS: There's no way for me
 12 to know --
 13 MR. STREET: Who'd know about -- I'm
 14 not asking who knew about it, but maybe the
 15 people who did publicly criticize, if it's
 16 not...
 17 MS. SANDERS: Yeah. Yeah.
 18 MR. STREET: And it's not -- you
 19 know, I'm talking people at the company. I'm
 20 not talking about reporters.
 21 MS. SANDERS: Right, right, right.
 22 So if there were people at the company
 23 that publicly criticized it and we're aware of
 24 it.
 25 MR. STREET: Uh-huh.

1 interviewed him, you know. So I'll point you
 2 to Jobvite and tell you where to look for that.
 3 And then I'll look to see -- I feel like there
 4 was one more I was going to do like that, but I
 5 got -- I've got a note.
 6 All right. So I'll do that on 2, and
 7 that takes care of 2.
 8 What was the other one? Yeah, 5. 5's
 9 actually pretty easy because Luke -- okay, let
 10 me ask you about 5.
 11 Luke LeFevre made the decision on the
 12 spot, and he is on the operating board, so he
 13 has -- you know, he has power. He has the
 14 authority to do that -- had, he's not there
 15 anymore. So -- but as you can see from the
 16 documents, there were conversations about Brad
 17 isn't going to -- this doesn't seem like it's
 18 working, we're going to give him -- they call
 19 it at Ramsey an emotional firing, which I don't
 20 really know what that means, but I think it
 21 means that we tell you this could happen, what
 22 do you think about it. They're very, like,
 23 relationship oriented.
 24 So they had a conversation with him --
 25 the intent was to have a conversation with him

1 MS. SANDERS: Okay, I don't know
 2 about that, but I'll ask the question.
 3 All right. Page 31. Okay, I think
 4 that's pretty much repeat.
 5 All right, then we get into the claims,
 6 retaliatory discharge. I think -- should we go
 7 through the claims or do you think if I address
 8 the facts?
 9 MR. STREET: I think if you address
 10 the facts --
 11 MS. SANDERS: Okay.
 12 MR. STREET: -- that this will be
 13 fine. These claims are just our legal claims
 14 based on those facts.
 15 MS. SANDERS: Yeah, on the facts.
 16 Okay.
 17 All right, so -- so then what I'm going
 18 to do is I'll go back to Interrogatory Number
 19 2, and I don't know that I have anybody new to
 20 list, but I'm going to list who I've already
 21 listed. I will go ahead and include the
 22 recruiter.
 23 MR. STREET: Uh-huh.
 24 MS. SANDERS: Or I'll -- and I'll
 25 point to Jobvite. Like, anybody using Jobvite

1 on -- and this is all in the documents, so --
 2 but he was terminated on the spot, and that was
 3 solely Luke LeFevre's decision. So I think
 4 that could be part of the issue, is --
 5 MR. STREET: What are you -- what
 6 document are you looking at now?
 7 MS. SANDERS: Yeah, I'm looking at
 8 Number 5, Interrogatory Number 5.
 9 MR. STREET: Oh.
 10 MS. SANDERS: On your -- on your --
 11 this is your original one and my original
 12 response.
 13 MR. STREET: Oh, okay. All right.
 14 Okay. I mean, again, I think if it's
 15 responsive, you can list it out, but if it's --
 16 if you've got a limited number of documents you
 17 could point to, that's fine, too.
 18 MS. SANDERS: Yeah. I think that's
 19 what I'll do, because truly the only person
 20 that made the decision was Luke LeFevre, but
 21 that doesn't mean there were other people --
 22 and it's mostly because I think this is a typo
 23 where you said "the decision to terminate or
 24 suspend."
 25 MR. STREET: Uh-huh.

1 MS. SANDERS: Well, nobody -- he
 2 wasn't suspended, but what that made me think
 3 is maybe you're looking for more than just the
 4 person who made the decision. To me, that's an
 5 easy answer. It's Luke LeFevre.

6 MR. STREET: Right.

7 MS. SANDERS: He was the only one.
 8 But there were other people who knew about it,
 9 and you can see that in the documents. So I
 10 can point you to those documents --

11 MR. STREET: Uh-huh.

12 MS. SANDERS: -- and then that's...

13 MR. STREET: Right, as long as this
 14 isn't, you know, a short range.

15 MS. SANDERS: It is. It's all going
 16 to be on one day.

17 MR. STREET: Okay.

18 MS. SANDERS: So it's pretty easy to
 19 -- it's pretty easy to look.

20 All right, so let me just do that.

21 Okay. And then Number 7, Number 7, I'm
 22 glad you pointed that one out because that's
 23 where you're asking for statements. So there's
 24 not any voicemail messages, there's nothing --
 25 but there's, as you know, scads of e-mails and

1 MS. SANDERS: Right, so you've got --
 2 so --
 3 MR. STREET: So just should be
 4 statements either made to the Plaintiff or
 5 about the Plaintiff concerning his termination,
 6 his job performance, his personal life. Yep, I
 7 think that one is pretty clear.

8 MS. SANDERS: Well, but this is
 9 between Plaintiff and Defendant.

10 MR. STREET: It says Plaintiff and
 11 Defendant and/or, three people, and/or any
 12 employee of Defendant.

13 MS. SANDERS: So it's not Plaintiff
 14 and/or any -- I mean, you have all this, but --
 15 I mean, you -- you have it all, anyway.

16 MR. STREET: Yeah. If I have it all,
 17 then --

18 MS. SANDERS: Yeah.

19 MR. STREET: -- if you just want to
 20 identify it by page number, that's fine.

21 MS. SANDERS: Well, it's going to be
 22 like 40,000 pages. I mean, it -- like, because
 23 that's what it is. That's -- you know, that's
 24 what it is.

25 MR. STREET: That's not much help,

1 there are text messages.

2 So you asked me to identify and describe
 3 all statements between Plaintiff and Defendant
 4 regarding his terminations, concerns about his
 5 job performance or concerns about his personal
 6 life. So you have all these statements.

7 MR. STREET: Uh-huh.

8 MS. SANDERS: Are you asking me to --
 9 what else are you asking me to do?

10 MR. STREET: All right, let me look
 11 at it again. It's...

12 MS. SANDERS: Yeah.

13 MR. STREET: Number 7.

14 MS. SANDERS: And this is a pretty --
 15 by the way, this is going to be a finite group,
 16 right, because it's between Plaintiff and
 17 Lampo, and you have his inbox --

18 MR. STREET: Uh-huh.

19 MS. SANDERS: -- and his outbox, so
 20 you have all this. It's about 6,000
 21 documents -- or -- no, I think it's like 6,000
 22 pages, so it's fewer documents.

23 MR. STREET: Between Plaintiff and
 24 Defendant or Defendant and any other employee
 25 of Defendant.

1 Leslie.

2 MS. SANDERS: Well, I guess what I
 3 can do -- I mean, I don't -- I can give you the
 4 range. I can show you the searches and I can
 5 give you the range of documents --

6 MR. STREET: Okay.

7 MS. SANDERS: -- or those responses.

8 MR. STREET: Just, you know, send me
 9 that, and before -- I won't say, oh no,
 10 ridiculous, Judge, Judge --

11 MS. SANDERS: Yeah.

12 MR. STREET: -- I'll be like, let me
 13 see, and then I'll get back with you if it's
 14 not.

15 MS. SANDERS: Okay. I've got -- I
 16 have a little bit of a logistical issue,
 17 because Armando Lopez is at a funeral this week
 18 in Texas, but I've made arrangements for him to
 19 review everything.

20 He's going to -- I don't think it's going
 21 to be an issue, but that's the only -- getting
 22 him signed might be a little bit of an issue,
 23 but I've already spoken to him. He knows
 24 what's coming. You know, I told him I would
 25 get back with him, but he's in flight today.

1 He's in a funeral tomorrow. Thursday morning,
 2 he's going to take a look at these.
 3 We should be fine. The only issue is if
 4 he can't sign them, but I'll get you the
 5 responses. They're due by Thursday.

6 MR. STREET: I don't -- I'm not going
 7 to fight for a day or two late, but I am
 8 probably going to put that into my motion to
 9 say, look, we're allowing them a couple extra
 10 days because Armando's at a funeral.

11 MS. SANDERS: Yeah.

12 MR. STREET: That supports my
 13 position to move discovery a little bit out.

14 MS. SANDERS: Yeah. Well, you're
 15 going to get them. It's just a matter -- I'll
 16 probably have them to you tomorrow. I just
 17 don't know --

18 MR. STREET: That'd be fine.

19 And really, if we can pass the deposition
 20 tomorrow so I can go get my head fixed --

21 MS. SANDERS: Uh-huh. Yeah.

22 MR. STREET: -- it would be great,
 23 so...

24 MS. SANDERS: I'm hoping they're
 25 going to respond and tell me she's -- hopefully

1 responses, I just don't think I have them
 2 verified.

3 MR. STREET: Okay.

4 MS. SANDERS: If you can check on
 5 that, that would be great.

6 Okay. So let's see, that takes care of
 7 the sanctions, takes care of the -- I think
 8 that's everything, unless you have something.

9 MR. STREET: I don't. And it's
 10 the -- no, I don't.

11 MS. SANDERS: Okay. All right, so
 12 I'm going to find out about JB Wagner. I'm
 13 going to send you that. I'll talk to my client
 14 about extension.

15 We're not going to agree to the more than
 16 ten. Do you think you're going to go over ten?
 17 Because if so, we should talk about that.

18 MR. STREET: I mean, let's see how
 19 the first few go and then we can see.

20 MS. SANDERS: Okay. That's fair
 21 enough.

22 MR. STREET: Is it ten? I mean, I
 23 know the --

24 MS. SANDERS: Well, you've got nine
 25 left. It's ten without leave of court.

1 we can get all that --

2 MR. STREET: And that will be no
 3 problem at all because we'll get them before
 4 the first deposition, which will be Friday.
 5 And then if they're -- I think we'd still be
 6 fine.

7 MS. SANDERS: I think Lauren Piper
 8 just responded, let's see what she said.

9 Okay. JB Wagner is out on the 11th. Let
 10 me -- but let me just -- let me -- let me find
 11 out what that means. If that just means he's
 12 got a project due that day, we'll work that
 13 out.

14 MR. STREET: Okay.

15 MS. SANDERS: All right. Let's see,
 16 I think that was all of the individual ones.

17 Speaking of interrogatories, I don't know
 18 that I ever got your responses verified. Can
 19 you just double-check that?

20 MR. STREET: Yeah.

21 MS. SANDERS: I have moved law firms,
 22 so it's possible it just didn't get moved, you
 23 know.

24 MR. STREET: Okay.

25 MS. SANDERS: But I have your

1 MR. STREET: Okay, ten for each
 2 Defendant? I don't remember off the top of my
 3 head.

4 MS. SANDERS: I thought it was ten
 5 total, but --

6 MR. STREET: Might be.

7 MS. SANDERS: -- I don't know. I'll
 8 just have to look at the rule, because I don't
 9 remember that.

10 MR. STREET: I do, too. I don't know
 11 off the top of my head, either.

12 MS. SANDERS: I rarely have multiple
 13 defendants.

14 MR. STREET: See, these lawyers, they
 15 don't remember everything you think we might
 16 remember constantly.

17 MS. SANDERS: No.

18 MR. STREET: There's a lot of stuff
 19 to try to stick up in there.

20 MS. SANDERS: And I don't -- I rarely
 21 have multiple defendants, so I never -- I don't
 22 think I've ever really looked at that, you
 23 know.

24 MR. STREET: Yeah. Me, neither,
 25 so...

1 MS. SANDERS: Okay. All right.
2 Well, we're good, I guess.
3 MR. STREET: All right, I'm glad we
4 did this.
5 MS. SANDERS: Yep.
6 (Proceeding concluded at 1:19 p.m. CST)

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25 LCR #864 - Expires: 6/30/2024

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